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Edward **Jones**®

VIA OVERNIGHT DELIVERY

January 20, 2004

Jonathan G. Katz Secretary United States Securities and Exchange Commission 450 Fifth Street, N.W. Washington, D.C. 20549-0609



Re: File No. SR-NYSE-2003-29; "Notice of Filing of Proposed Rule Change to Amend Rule 412 and its Interpretation Relating to Partial Customer Account Transfers"

Dear Mr. Katz:

Enclosed please find six copies of the comment letter of Edward D. Jones & Co., LP concerning the above-referenced proposal by the New York Stock Exchange, Inc.

If you have any questions, please contact the undersigned at (314) 515 – 6478.

Sincerely,

Kristie Thompson Department Leader

Customer Account Transfer

Kustee Thompson

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Re: File No. SR-NYSE-2003-29; "Notice of Filing of Proposed Rule Change to Amend Rule 412 and its Interpretation Relating to Partial Customer Account Transfers"

Dear Mr. Katz:

Edward D. Jones & Co., LP ("Edward Jones", or the "Firm") submits this letter in support of the above-referenced proposal ("Proposal") by the New York Stock Exchange, Inc. ("NYSE"). Edward Jones greatly appreciates the opportunity to share its comments on the proposed changes.

As background, Edward Jones is a full-service, self-clearing firm that does business in all 50 States. The Firm services over 5 million customer accounts, the vast majority of which are retail in nature. As a frequent user of the Automated Customer Account Transfer Service ("ACATS"), the Firm has for some time now actively sought the currently proposed improvements to the transfer process through both formal committee work and informal discussions with NYSE staff.

Because the proposal mandates that all "non-standard" transfers become subject to both Rule 412 and its interpretation, the Firm supports the Proposal in whole. Additionally, the Firm applauds the Proposal's specific incorporation of, among other things, partial transfers, "fail reversals", and reclaims into the operative definition of non-standard transfers.

Moreover, the Firm's sample research indicates that currently a partial transfer of customer assets initiated outside the ACATS takes at least three times as long as a transfer requested through the ACATS system (e.g., 15 business days for the former versus 4 business days for the latter). It is thus the Firm's opinion that the uniform application of relevant rules to customer requests of varying degrees is clearly in the best interests of efficiency.

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Finally, the Firm supports the progressive nature of the Proposal, which, by recognizing an electronic signature as a valid "Client Authorization" acknowledges the increasingly global nature of securities transactions.

For these reasons, Edward Jones believes the Proposal will significantly improve the experience of the investor when transferring assets.

The Firm thanks the Commission once again for this opportunity to share its unqualified support for the NYSE's Proposal. Any questions or requests for elaboration should be directed to the undersigned, who can be reached at (314) 515 - 6478.

Sincerely,

Kristie Thompson Department Leader

Customer Account Transfer

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